

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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In re	:	Chapter 9
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CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
	:	
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**THE DETROIT POLICE LIEUTENANTS & SERGEANTS
ASSOCIATION’S LIST OF FACT WITNESSES RELATED TO
THE PROPOSED PLAN FOR THE ADJUSTMENT OF DEBTS**

Detroit Police Lieutenants & Sergeants Association (hereinafter “DPLSA”), by its attorneys, Erman, Teicher, Zucker & Freedman, P.C., and Peter P. Sudnick, PC, and in accordance with this Court’s Fourth Amended order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment [Docket No. 4202] (the “Scheduling Order”), hereby submits its list of fact witnesses and identifies the subject that each witness will address:

1. The DPLSA identifies the following individuals, exclusive of those to be offered for rebuttal purposes, as fact witnesses that it may call at the hearing on the proposed plan for the adjustment of the City’s debts (the “Plan”)

a. Lieutenant Mark Young, President DPLSA

Lieutenant Young will testify regarding whether the proposed treatment of the DPLSA's pension claims under the Plan is fair and equitable and feasible and the possible public safety issues related to the City's ability to provide essential police services to the City.

b. Lieutenant Rodney Sizemore, Vice President DPLSA

Lieutenant Sizemore will testify regarding whether the proposed treatment of the DPLSA's pension claims under the Plan is fair and equitable and feasible and the possible public safety issues related to the City's ability to provide essential police services to the City.

2. The DPLSA reserves the right to call and cross-examine any witnesses listed by the City, the Retirement Systems, the Retiree Committee, the DPOA, the DPCOA, the DFFA and/or any other objecting party.

3. The DPLSA reserves the right to supplement the testimony topics associated with each witness referenced above, and reserves the right to supplement its list of fact witnesses as may be necessary.

ERMAN, TEICHER, ZUCKER & FREEDMAN, P.C.

By: /s/ Barbara A. Patek

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Dated: May 12, 2014

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CERTIFICATE OF SERVICE

The undersigned certifies that on May 12, 2014 the Detroit Police Lieutenants & Sergeants Association's List of Fact Witnesses Related to the Proposed Plan for the Adjustment of Debts was electronically filed with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Michigan, Southern Division using the CM/ECF System, which will send notification of such filing to the Debtor and to all attorneys and parties of record registered electronically.

/s/ Barbara A. Patek

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Dated: May 12, 2014